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February 29, 2024

VIA E.C.F.

Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMORANDUM ENDORSED

Re: Jason Goodman v. the City of New York, et al.,
23 Civ. 9648 (JGLC) (GWG)

Your Honor:

I am an Assistant Corporation Counsel of the New York City Law Department and the attorney representing defendant the City of New York in this matter. The City writes to respectfully request a brief, one week extension of time to respond to the operative pleading in this matter from March 4, 2024, until March 11, 2024, and to respectfully request that the Court *sua sponte* extend the time for the individual defendants to respond by the same. This is the City's third request for such an extension. Plaintiff consents to the instant request, as does Defendant Sharp, and Defendant "X Corporation" does not oppose the request.

By way of background, on January 19, 2024, we asked the Court for a forty-five day extension of time to respond to the Complaint. (ECF No. 42). That request was denied, as Plaintiff's position was not noted in the letter. (ECF No. 43). On February 5, 2024, we renewed that motion, noting that Plaintiff consented to the request, and it was granted. (ECF Nos. 50, 51). Thus, the present deadline for our response is March 4, 2024.

We had not received an executed 160.50 release from the Plaintiff until yesterday. Now that we have the release, we will now be able to receive and review documentation concerning his underlying criminal matter. Pursuant to our obligations under Rule 11 of the Federal Rules of Civil Procedure, we must investigate all of the allegations in the complaint. Obtaining the release will allow us to do so.

We are intending on filing a motion to dismiss on behalf of the City and the individual defendants. While we do not yet represent the individual defendants, the City respectfully contends that the filing of one responsive pleading would benefit the Court and the parties as it would minimize the need to cite to multiple responses and would not prejudice the Plaintiff. Moreover, having one response would avoid any potential confusion that may arise with

respect to the defendants' claims and defenses. Nevertheless, due to scheduling conflicts, and other time sensitive matters, I require additional time to finalize our motion papers. Accordingly, I ask for a one-week extension of time to file our motion.

The City thanks the Court for its time and consideration herein.

Respectfully submitted,

Mary Jane Anderson /s/
Mary Jane Anderson
Assistant Corporation Counsel
Special Federal Litigation Division

Cc: VIA FIRST-CLASS MAIL
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VIA ECF
Counsel of Record

Extension to March 11, 2024, granted.

So Ordered.

Gabriel W. Gorenstein
GABRIEL W. GORENSTEIN
United States Magistrate Judge

March 1, 2024